



counsel, as defined therein, would be required absent leave. However, given Mr. Welmaker's experience regarding FLSA single and collective action lawsuits, which he has litigated for over 25 years, and his prior experience litigating cases in the Northern District of Texas, Plaintiff hereby seeks leave to proceed without local counsel.<sup>2</sup> Given the fact that the Fort Worth Courthouse is approximately 2.5 hours from Counsel's current residence in Longview, Texas, Mr. Welmaker can easily appear before the Court, in person or via Zoom, the very same day he is requested to appear before the Court, provided there are no scheduling conflicts. Furthermore, granting leave to allow Plaintiff to proceed without the requirement to retain additional local counsel will avoid duplication of effort and spare additional legal expense.

Respectfully submitted,

/s/ Douglas B. Welmaker

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<sup>2</sup> Both Judge Barbara Lynn (*Pacheco v. Insane Vinyl, LLC et al*, CA 3:22-cv-1478-M, Dkt. 6), Judge Brantley Starr (*Owens v. AMK Desoto*, CA 3:22-cv-1455-X, Dkt. 8 and *Lozano v. Go Wild Fabrication & Welding LLC*, CA 3:22-cv-2107-X, Dkt. 9), and Judge O'Connor (*Frazier v. KM Holdings, Granbury, LLC et al*, CA 4:23-cv-761-O, Dkt. 6; *Moore v. Kinship Place*, CA 4:24-cv-01036, Dkt. 9) have recently granted the same motion to proceed without local counsel.